# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

PEARSON EDUCATION, INC.;
BEDFORD, FREEMAN & WORTH
PUBLISHING GROUP, LLC D/B/A
MACMILLAN LEARNING;
MACMILLAN HOLDINGS, LLC;
CENGAGE LEARNING, INC.;
ELSEVIER INC.; ELSEVIER B.V.; and
MCGRAW HILL LLC,

Plaintiffs,

٧.

KHALED HASAN; NASIMA AKHTER; ANIL KUMAR; RAJIV KUMAR; KOUROS SHAHIDI GHAMSARI; ANK EXIM LLC; AURUM AMB LLC; IIZ FORWARDING LLC; WESTPVTLTD LLC; and DOES 1–50,

Defendants.

Civil Action No. 23-cv-07284-PAC

[PROPOSED] PRELIMINARY PAREINJUNCTION

Plaintiffs Pearson Education, Inc. ("Pearson"), Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning ("Macmillan Learning"), Cengage Learning, Inc. ("Cengage"), Elsevier Inc. ("Elsevier"), and McGraw Hill LLC ("McGraw Hill") (collectively, the "Publishers"), and Macmillan Holdings, LLC ("Macmillan Holdings") and Elsevier B.V. (collectively, with the Publishers, "Plaintiffs"), have moved for a preliminary injunction against Defendants Khaled Hasan, Nasima Akhter, Anil Kumar, Rajiv Kumar, Kouros Shahidi Ghamsari, ANK EXIM LLC; AURUM AMB LLC, IIZ FORWARDING LLC, WESTPVTLTD LLC, and Does 1–50, who are also identified by the currently known seller names, names, aliases, and email addresses described in **Appendix C** hereto (collectively, "Defendants"). Plaintiffs so move the Court on the basis that Defendants are distributing unauthorized, counterfeit copies of the

Publishers' copyrighted textbooks that bear identical or substantially indistinguishable reproductions of the registered trademarks of Plaintiffs Pearson, Cengage, Elsevier, Elsevier B.V., Macmillan Holdings, and McGraw Hill ("Trademark Plaintiffs"). Plaintiffs allege that these distributions occur through importations, sales on online storefronts Defendants own and/or operate on online marketplaces ("Online Storefronts"), including Amazon.com, Abebooks.com, and eBay.com ("Online Marketplaces"), and sales on "buyback portals" operated by several national textbook distributors ("National Distributors").

The Court having reviewed the Complaint, the Memorandum of Law filed in support of Plaintiffs' Application for a Temporary Restraining Order and Order to Restrain Assets, Order to Show Cause for a Preliminary Injunction, Order to Seize or Impound Goods, Expedited Discovery Order, and Order Authorizing Alternate Service By Electronic Mail (the "Application"), the declarations filed in support of the Application, the Declaration of Michele H. Murphy filed in support of the Preliminary Injunction, and the entire record herein, makes the following findings of fact and conclusions of law:

#### FACTUAL FINDINGS AND CONCLUSIONS OF LAW

- 1. Plaintiffs have provided Defendants with notice of the Complaint and the exhibits thereto, the Court's August 17, 2023 Ex Parte Order ("August 17, 2023 Ex Parte Order") granting the Application, the Court's August 28, 2023 Modified Ex Parte Order ("August 28, 2023 Modified Ex Parte Order"), and the other papers filed in this case, as set forth in the Declaration of Daryl L. Kleiman filed by Plaintiffs.
- 2. The Court has personal jurisdiction over Defendants under Section 302(a) of the New York Civil Practice Law and Rules ("C.P.L.R.") on the grounds that Defendants: (i) own and/operate highly interactive online storefronts on highly interactive websites that are continuously accessible to and sell and deliver goods to consumers in New York, including copies

of the Publishers' textbooks that are listed in in Exhibit A to the Complaint, which is attached hereto as **Appendix A** (the "Authentic Works"); (ii) have sold copies of the Publishers' textbooks to New York consumers, including copies of the Authentic Works; (iii) have engaged in the importation of textbooks into the Port of New York and New Jersey and/or by air into New York, including copies of certain Authentic Works; and/or (iv) have committed tortious acts in New York by the above-described conduct or caused injury to Plaintiffs in New York.

- 3. As a result of Defendants' distribution of counterfeit copies of the Authentic Works ("Counterfeit Textbooks") in the United States, (i) the Publishers are likely to succeed in showing that Defendants have infringed and are continuing to infringe the federally registered copyrights in the Authentic Works the Publishers own or exclusively control, including through sales to National Distributors and on at least the following Online Storefronts: 1) Prowisdombooks on Amazon.com; 2) geniuswindow on eBay.com; 3) ncbooks on eBay.com; 4) QUEVECK on Abebooks.com; 5) extravision on Amazon.com; 6) my favourite book store on Amazon.com; and 7) padid798 on eBay.com; and (ii) the Trademark Plaintiffs are likely to succeed in showing that Defendants have infringed and are continuing to infringe the federally registered trademarks of which the Trademark Plaintiffs are the owners and/or registrants, as defined in 15 U.S.C. § 1127 (the "Marks"), including by using counterfeit reproductions of the Marks, as defined in 15 U.S.C. § 1127, in commerce in connection with the sale, offering for sale, and/or distribution of Counterfeit Textbooks.
- 4. The continued sale and distribution of the Counterfeit Textbooks, and the infringing reproductions of the Marks in connection therewith, will result in immediate and irreparable injury to Plaintiffs if the requested relief is not granted.

- 5. The balance of potential harm to Defendants, if any, by being prevented from continuing to profit from infringing activities if a Preliminary Injunction is issued is far outweighed by the harm to Plaintiffs, their businesses, and the value associated with the Publishers' copyrights and the Marks if a Preliminary Injunction order is not issued.
- 6. Public interest favors issuance of a Preliminary Injunction in order to protect Plaintiffs' interests in their intellectual property rights and to protect the public from the harm caused by Defendants' activity at issue in this case, including the potential that consumers will be confused and deceived into believing, incorrectly, that they are purchasing authentic copies of the Publisher's textbooks.
- 7. Based on the evidence presented concerning the nature and extent of Defendants' counterfeiting activities, their efforts to conceal their identities and Counterfeit Textbook sales, and the actions of other counterfeiters in the comparable position of Defendants, without the asset restraint provisions set forth below, Defendants are likely to secrete, conceal, transfer, or otherwise dispose of the proceeds from their sales of the Counterfeit Textbooks, thus frustrating Plaintiffs' ability to obtain the final relief they seek.
- 8. On or about August 21, 2023, Defendant Hasan was given notice of this case while it was still under seal by a third-party that had been served with a subpoena pursuant to the Expedited Discovery Order in the August 17, 2023 *Ex Parte* Order. Defendant Hasan appeared at a seizure executed by the United States Marshals on August 22, 2023 at Extra Space Storage, 601 Maynard Crossing Court, Cary, North Carolina 27513 ("August 22, 2023 Seizure") pursuant to the Order to Seize or Impound Goods in the August 17, 2023 *Ex Parte* Order ("August 17, 2023 Seizure Order"). Plaintiffs then provided Defendant Hasan with a copy of the sealed

Complaint and the August 17, 2023 Ex Parte Order and advised Defendant Hasan to obtain legal counsel.

- 9. During the August 22, 2023 Seizure, Plaintiffs discovered over a hundred thousand textbooks and other written works in nine large storage units rented by Defendant Hasan ("ESS Storage Units"). The Publishers have confirmed that the ESS Storage Units contain thousands of counterfeit copies of the Publishers' Copyrighted Works. On August 22, 2023, Defendant Hasan consented to Plaintiffs taking possession of the ESS Storage Units, as well as their contents, including any items sent to, addressed to, or otherwise en route to the ESS Storage Units ("ESS Seized Products"), until and including September 21, 2023. Following the August 22, 2023 Seizure, Defendants Hasan and his wife, Nasima Akhter, retained counsel in Raleigh, North Carolina. On September 12, 2023, Defendant Hasan, through such counsel, consented to Plaintiffs taking or maintaining possession of the ESS Seized Products for an additional 90 days, until and including December 20, 2023. Plaintiffs (and their agents) remain in the process of reviewing the contents of the ESS Storage Units in order to identify counterfeits.
- 10. On September 8, 2023, Defendants Hasan and Akhter, through counsel, also provided a signed consent permitting Plaintiffs (and their agents, including their counsel Oppenheim + Zebrak, LLP) to take possession of any and all goods relating to importations of books by Defendants Hasan and Akhter, on their behalf, or bound for them ("Importation Products"), including shipments for which the importer, consignee, or destination address is 601 Maynard Crossing Court, Cary, North Carolina 27513 (the ESS Storage Units address). This consent extends to any and all goods relating to past, present, and/or future importations of books by Defendants Hasan and Akhter or their behalf, including but not limited to five shipments that

Defendants Hasan and Akhter understand are currently being detained by U.S. Customs & Border Protection ("CBP").

In an effort to fully effectuate the August 17, 2023 Seizure Order, Plaintiffs 11. provided CBP with the August 17, 2023 Ex Parte Order, as well as the sealed Complaint in this action. CBP's position is as follows: Pursuant to its independent authority for the border enforcement of intellectual property rights (e.g., 19 U.S.C. § 1526(e), 19 U.S.C. § 1595a(c)(2)(C), 19 U.S.C. § 1499, 15 U.S.C. § 1124, 17 U.S.C. § 602), CBP has agreed to detain goods relating to importations by Defendants in five shipments ("Detained Shipments") that have arrived at the Port of JFK Airport in New York and the Port of Newark, New Jersey (the "Port Seizures") to date, for a period of 30 days from the arrival date of each shipment. However, recognizing these enforcement actions are undertaken pursuant to its independent authority noted above, CBP reserves the right in the future to move to quash the August 28, 2023 Ex Parte Order as it has objections to the interpretation and the applicability of the Lanham Act provision in question and, therefore, does not concede that it is bound to take action or by the procedure set forth in the August 17, 2023 Seizure Order as it pertains to CBP. Plaintiffs' position is as follows: The Lanham Act, 15 U.S.C. § 1116(d) applies to CBP, including pursuant to 15 U.S.C. § 1116(d)(9), and the August 17, 2023 Seizure Order and this Order are proper with respect to CBP, including as they concern trademarks that are registered with the U.S. Patent and Trademark Office but not separately with CBP. Notwithstanding these respective positions, Plaintiffs and CBP are meeting and conferring regarding the continued detention and the disposition of the Detained Shipments and have agreed to update the Court on the progress of these efforts by September 18, 2023. For confirmation, CBP reserves all rights and is not conceding any issues by not objecting to the August 17, 2023 Ex Parte Order or any amended

order at this time, and Plaintiffs reserve all rights and are not conceding any issues by not objecting to the modified provisions of the August 28, 2023 Modified *Ex Parte* Order as they pertain to CBP.

NOW, THEREFORE, IT IS HEREBY ORDERED, in accordance with Federal Rules of Civil Procedure 64 and 65, the Copyright Act (17 U.S.C. § 502(a)), the Lanham Act (15 U.S.C. § 1116), N.Y. C.P.L.R. §§ 6201 *et al.*, and the Court's inherent equitable power to issue provisional remedies ancillary to its authority to provide final equitable relief, and no prior application having been granted, that:

- 1. Defendants, their officers, agents, employees, and attorneys, and all those in active concert or participation with any of them, who receive actual notice of this Preliminary Injunction, are enjoined from:
  - a. Directly or indirectly infringing any copyrighted work that is owned or exclusively controlled by any of the Publishers ("Publishers' Copyrighted Works"), i.e., any copyrighted works published under any of the imprints identified in Exhibit C to the Complaint, which is attached hereto as Appendix B (the "Imprints"); and
  - b. Directly or indirectly infringing any trademark to which any of the Trademark Plaintiffs are the owners and/or registrants under 15 U.S.C. § 1127 ("Trademark Plaintiffs' Marks").

Without limiting the foregoing, this injunction includes:

c. Directly or indirectly manufacturing copies of or otherwise reproducing the Publishers' Copyrighted Works or the Trademark Plaintiffs' Marks;

- d. Directly or indirectly exporting, importing, distributing, selling, offering for sale, advertising, marketing, or promoting counterfeit or pirated copies of the Publishers' Copyrighted Works or the Trademark Plaintiffs' Marks; and
- e. Enabling, facilitating, permitting, assisting, soliciting, encouraging, or inducing others to engage in the activities described in paragraphs 1(a)–(d) above;
- Defendants, their officers, agents, employees, and attorneys, and all those in active 2. concert or participation with any of them, who receive actual notice of this Preliminary Injunction, and service providers to Defendants or other non-parties who receive actual notice of Preliminary Injunction and operate or control accounts holding or receiving money or other assets owned by, related to, connected to, associated with, held by, or transferred in connection with Defendants' Online Storefronts, sales or attempted sales to the National Distributors, or distributions (including importations) of the Publishers' Copyrighted Works ("Defendants' Accounts"), must immediately locate all of Defendants' Accounts and immediately cease transferring, withdrawing, or otherwise disposing of any money or other assets in Defendants' Accounts or allowing such money or other assets in Defendants' Accounts to be transferred, withdrawn, or otherwise disposed of. Defendants' Accounts include, but are not limited to Defendants' Accounts with Online Marketplaces and National Distributors; payment processing services, such as PayPal, Inc. ("Payment Processors"); and banks, savings and loan associations, credit card processing agencies, merchant acquiring banks, cryptocurrency exchanges, and other companies that engage in the processing or transfer of money and/or other assets ("Financial Institutions"), including but not limited to those accounts listed on Appendix D hereto.

IT IS FURTHER ORDERED that Defendants shall preserve copies of all documents, including electronically stored information, in their possession, custody, or control relating to any

importations, distributions, or sales of Publishers' Copyrighted Works, and all copies of the Publishers' Copyrighted Works and products displaying the Trademark Publishers' Trademarks, and shall take all steps necessary to retrieve any such information or products that may have been deleted or disposed of before the entry of this Order.

IT IS FURTHER ORDERED that the August 17, 2023 Seizure Order, issued in accordance with 15 U.S.C. § 1116(d), as to the seizure at Extra Space Storage, 601 Maynard Crossing Court, Cary, North Carolina 27513, is CONFIRMED. Plaintiffs' counsel shall continue to act as substitute custodian for the property seized pursuant to such seizure. Neither Defendants nor Extra Space Storage shall destroy, transfer, remove, or otherwise dispose of any ESS Seized Products until further Order of this Court.

IT IS FURTHER ORDERED that, on consent of Plaintiffs and Defendants Hasan, Akhter, AURUM AMB LLC, and IIZ FORWARDING LLC, Plaintiffs are permitted to continue to possess or take possession of any and all ESS Seized Products not covered by the immediately preceding paragraph, and Importation Products, until and including December 20, 2023, provided that a separate procedure will apply to Importation Products in the custody of CBP, as described in the paragraph immediately below.

IT IS FURTHER ORDERED that Plaintiffs and CBP shall continue to engage in a meet and confer process concerning importations related to the Seizure Defendants, as referenced in paragraph 11 of the Factual Findings and Conclusions of Law. By September 18, 2023, Plaintiffs and CBP will provide the Court with a: (1) a stipulated seizure order; (2) a proposed briefing process relating to the issuance of an order applicable to CBP; or (3) request for additional time to attempt to resolve the matter. CBP has also agreed to detain the Detained Shipments for a period of 30 days from the arrival date of each shipment.

IT IS FURTHER ORDERED that the Expedited Discovery Order and the Order Authorizing Alternate Service by Electronic Mail contained in the August 17, 2023 Ex Parte Order and August 28, 2023 Modified Ex Parte Order shall remain in effect until further order of the Court.

IT IS FURTHER ORDERED that this Preliminary Injunction shall no longer apply to any Defendant dismissed from this action.

SO ORDERED this the Aday of September 2023 at \_

Paul A. Crotty

UNITED STATES DISTRICT JUDGE

# Appendix A - Authentic Works

Tittle Publisher Copyright Registration Planning Care, 6th Anatomy and Physicology Coloring Workbook: A Registration Promary Care, 6th Complete Study Guide, 12th Commplete Study Guide, 12th Commplete Study Guide, 12th Construction Planning and Scheduling, 4th Pearson TX0008476224 my favourite book store Construction Planning and Scheduling, 4th Pearson TX0008208260 genius vindow Construction Planning, Equipment, and Methods, 9th McGraw Hill TX0008561238 Counterfeit Buyback Transactions Contemporary Logistics, 12th Pearson TX0008561238 Counterfeit Buyback Transactions Clinicians, 2nd Professional Issues in Counseling Pearson TX0008568417 provisidombooks: QUEVECK Clinicians, 2nd Professional Issues in Counseling Pearson TX0008790635 Counterfeit Buyback Transactions (The Merrill Counseling), 6th Pearson TX0008790635 Counterfeit Buyback Transactions (TX000791188) provisidombooks: QUEVECK Clinicians, 2nd Professional Issues in Counseling Pearson TX0008242375 my favourite book store Pearson TX000834037 my favourite book store TX0007313403 Counterfeit Buyback Transactions (TX00079071188) provisidombooks (TX0007907271 provisidombooks Transactions (TX0007907271 provisidombooks Transactions (TX0007907271 provisidombooks TX0007907271 provisidombooks TX007907271 pr				
Registration   Number	and the state of t	Publisher	Copyright	Online Storefront or Counterfeit Buyback
Elsevier   TX0007511204			Registration Number	
Pearson         TX0008476224         1           McGraw Hill         TX0006238860         0           Pearson         TX0008520629         1           Pearson         TX0008520629         1           Pearson         TX0007488334         1           9th         McGraw Hill         TX0008561238         1           Pearson         TX0008377398         1           Cengage         TX0008377398         1           Cengage         TX0008790635         1           Iing         Pearson         TX0007573188           Pearson         TX0007573188         1           Pearson         TX0007690271         1           pmics         McGraw Hill         TX0007513422           hy,         Elsevier         TX0007164368           Pearson         TX0008149272	Advanced Health Assessment & Clinical Diagnosis in	Elsevier	TX0007511204	my favourite book store
Pearson   TX0008476224	Primary Care, 6th			
McGraw Hill   TX0006238860   Pearson   TX0008520629   Pearson   TX0008520629   Pearson   TX0007488334   Pearson   TX0007884074   TX0008561238   Pearson   TX0008561238   TX0008377398   TX0008377398   TX0008568417   Pearson   TX0008790635   TX0007573188   Pearson   TX0007573188   Pearson   TX000757334043   TX0007690271   TX0007690271   TX0007513422   Pearson   TX0007513422   Pearson   TX0007164368   Pearson   TX0007164368   Pearson   TX0007164368   Pearson   TX0008149272   TX0008149272		Pearson	TX0008476224	my favourite book store
McGraw Hill         TX0006238860           Pearson         TX0008520629           Pearson         TX0007488334           McGraw Hill         TX0007884074           Pearson         TX0007884074           Cengage         TX0008377398           Cengage         TX0008377398           Pearson         TX0008790635           Pearson         TX0007573188           Pearson         TX000757334043           Cengage         TX0007690271           S McGraw Hill         TX0007513422           Pearson         TX0007513422           Elsevier         TX0007164368           Elsevier         TX0008149272	Complete Study Guide, 12th			
Pearson         TX0008520629           Pearson         TX0007488334           McGraw Hill         TX0008561238           Pearson         TX0008561238           Cengage         TX0007884074           Cengage         TX0008377398           Cengage         TX0008377398           Pearson         TX0008790635           Pearson         TX0007573188           Pearson         TX0007573188           Pearson         TX0007334043           Cengage         TX0007690271           s McGraw Hill         TX0007513422           Pearson         TX0007513422           Elsevier         TX0007164368           Elsevier         TX0008149272		McGraw Hill	TX0006238860	Counterfeit Buyback Transactions
Pearson         TX0007488334           McGraw Hill         TX0008561238           Pearson         TX0007884074           Cengage         TX0008377398           Cengage         TX0008377398           Pearson         TX0008790635           Pearson         TX0007573188           Pearson         TX0007573188           Pearson         TX0007334043           Cengage         TX0007690271           s McGraw Hill         TX0007513422           Pearson         TX0008565510           Pearson         TX0007164368           Elsevier         TX0008149272		Pearson	TX0008520629	geniuswindow
McGraw Hill         TX0008561238           Pearson         TX0007884074           Cengage         TX0008377398           Cengage         TX0008377398           Cengage         TX0008377398           Pearson         TX0008790635           Pearson         TX0007573188           Pearson         TX0007573188           Pearson         TX0007334043           Cengage         TX0007690271           S McGraw Hill         TX0007513422           Pearson         TX0008565510           Pearson         TX0007164368           Elsevier         TX0008149272		Pearson	TX0007488334	Counterfeit Buyback Transactions
TX0007884074 TX0008377398 TX0008377398 TX0006568417 TX0008790635 TX0007573188 TX0007573188 TX0007334043 TX00078803609 TX0007513422 TX0008565510 TX0008149272		McGraw Hill	TX0008561238	Counterfeit Buyback Transactions
TX0008377398 TX0006568417 TX0006568417 TX0008790635 TX0007573188 TX0007573188 TX0007334043 TX0007690271 TX0008803609 TX0007513422 TX0008565510 TX0008149272		Pearson	TX0007884074	Counterfeit Buyback Transactions
TX0006568417  TX0008790635  TX0007573188  TX000757334043  TX0007513422  TX0008565510  TX0007164368  TX0008149272	le Core, 9th	Cengage	TX0008377398	Counterfeit Buyback Transactions
TX0008790635  TX0007573188  TX0008242375  TX0007334043  TX0007690271  TX0008803609  TX0007513422  TX0008565510  TX0008149272	s: Techniques and Strategies for	Cengage	TX0006568417	prowisdombooks; QUEVECK
TX0007573188 TX0008242375 TX0008242375 TX0007690271 TX0008803609 TX0007513422 TX0008565510 TX0007164368 TX0007164368	al Issues in Counseling	Pearson	TX0008790635	Counterfeit Buyback Transactions
TX0007334043 TX0007334043 TX0007690271 TX0008803609 TX0007513422 TX0008565510 TX0007164368 TX0008149272	116), Vai		TX70007577100	
TX0008242375 TX0007334043 TX0007690271 TX0008803609 TX0007513422 TX0008565510 TX0007164368 TX0008149272		Pearson	1X000/5/5188	prowisdombooks
TX0007334043 TX0007690271 TX0008803609 TX0007513422 TX0008565510 TX0007164368 TX0008149272	Family Therapy: Concepts and Methods, 11th	Pearson	TX0008242375	my favourite book store
TX0007690271 TX0008803609 TX0007513422 TX0008565510 TX0007164368 TX0008149272	n, 3rd	Pearson	TX0007334043	Counterfeit Buyback Transactions
TX0008803609  TX0007513422  TX0008565510  TX0007164368  TX0008149272	Learning and Behavior, 7th	Cengage	TX0007690271	prowisdombooks
Pearson         TX0007513422           Elsevier         TX0008565510           Pearson         TX0007164368           Elsevier         TX0008149272	Managerial Economics (The McGraw-Hill Economics Series). 12th	McGraw Hill	TX0008803609	geniuswindow
Elsevier       TX0008565510         Pearson       TX0007164368         Elsevier       TX0008149272	Market-Based Management, 6th	Pearson	TX0007513422	geniuswindow
Pearson         TX0007164368           Elsevier         TX0008149272	Mosby's Exam Review for Computed Tomography, 3rd	Elsevier	TX0008565510	Counterfeit Buyback Transactions
Elsevier TX0008149272	Patternmaking for Fashion Design, 5th	Pearson	TX0007164368	Counterfeit Buyback Transactions
	Physical Examination and Health Assessment, 8th	Elsevier	TX0008149272	padid798; Counterfeit Buyback Transactions

# Appendix A - Authentic Works

Title	Publisher	Copyright Registration	Online Storefront or Counterfeit Buyback Transaction
		Number	
Pocket Companion for Physical Examination and	Elsevier	TX0008133847	Counterfeit Buyback Transactions
Health Assessment, 8th			
Policy and Politics in Nursing and Health Care, 8th	Elsevier	TX0007760963	ncbooks; Counterfeit Buyback Transactions
Principles of Macroeconomics, 9th	Cengage	TX0008935097	Counterfeit Buyback Transactions
Principles of Microeconomics, 9th	Cengage	TX0008988436	Counterfeit Buyback Transactions
Psychology, 13th	Macmillan Learning	TX0009054292	Counterfeit Buyback Transactions
Rapid Review Pathology, 5th	Elsevier	TX0007732939	geniuswindow
	Cengage	TX0008432608	geniuswindow
Practical Introduction to Business Analytics, 8th			
Statistical Methods for the Social Sciences, 5th	Pearson	TX0008538328	Counterfeit Buyback Transactions
Structural Analysis, 10th	Pearson	TX0008734403	Counterfeit Buyback Transactions
Supply Chain Management, 7th	Pearson	TX0008571575	Counterfeit Buyback Transactions
Teaching in Nursing, 6th	Elsevier	TX0008838277	Counterfeit Buyback Transactions
The Essentials of Family Therapy, 7th	Pearson	TX0008787731	extravision
The Essentials of Statistics: A Tool for Social	Cengage	TX0008048909	prowisdombooks
Research, 4th			The state of the s
The Handbook of Loan Syndications and Trading,	McGraw Hill	TX0006436903	QUEVECK
Understanding Financial Statements, 11th	Pearson	TX0008023145	prowisdombooks
Varcarolis' Foundations of Psychiatric-Mental Health	Elsevier	TX0007797007	Counterfeit Buyback Transactions
Nursing, 9th			

# Appendix B - Publishers' Imprints

Cengage Learning	Macmillan Learning
Brooks Cole	Bedford, Freeman & Worth High School Publishers
Cengage	Bedford/St. Martin's
Cengage Learning	BFW
Course Technology	BFW High School Publishers
Delmar	Freeman
Gale	Macmillan Learning
Heinle	W.H. Freeman & Company
Milady	Worth
National Geographic Learning	Worth Publishers
South-Western Educational Publishing	
Wadsworth	
	Elsevier
Academic Cell	Medicine Publishing
Academic Press	Morgan Kaufmann Publishers
Amirsys	Mosby
Butterworth Heinemann	Newnes
Digital Press	North Holland
Elsevier	Saunders
Gulf Professional Publishing	Urban & Fischer
Hanley & Belfus	William Andrew
Knovel	Woodhead Publishing
Made Simple Books	
McGraw Hill	Pearson
Irwin	Addison Wesley
Lange	Adobe Press
McGraw-Hill	Allyn & Bacon
McGraw-Hill Education	Benjamin Cummings
McGraw-Hill Higher Education	Big Nerd Ranch Guides
McGraw-Hill Professional	Brady
McGraw-Hill Ryerson	Cisco Press
McGraw-Hill/Appleton & Lange	Edexcel
McGraw-Hill/Contemporary	Financial Times Press/FT Press
McGraw-Hill/Dushkin	IBM Press
McGraw-Hill/Irwin	Longman
McGraw Hill	Microsoft Press
NTC/Contemporary	New Riders Press
Osborne	Peachpit Press
Schaum's	Pearson
	Pearson Education
	Que Publishing
	Sams Publishing
	VMware Press

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Defendant, Alias, or Other Name Used	Email Address	Business Name, Additional Name, or Marketplace
24x7 Book	inospirestore@gmail.com	inospire♥ (Amazon)
24x7 Book	lifeoktatas@gmail.com	textandread $\angle$ (Amazon)
ABC TRACKING / Pankaj		extravision (Amazon)
ABC Tracking Pankaj	thenewbookstoreonamazon@gmail.com	my favourite book store (Amazon)
Abdul Karim Alhammoud	karimqw@gmail.com	
Abdul Karim Alkhlif Alhammoud	karimalhamoud@gmail.com	
Abdulbaset Jawed	jabdulbaset@yahoo.com	
Adel Aiken-Brewster	amaincomestreams@gmail.com	
Ajay Kumar		
Alex Davidson	deepdcdd@gmail.com	
Alex Davidson	maxonlinemarkets@gmail.com	
Allie Shub	bestbuyerlicusa@gmail.com	
AMAZON SHIPPERS	usaeditionbookstore@gmail.com	NY City Books (Amazon)
Ammar Perwez	ammar.perwez1@gmail.com	
Amy Graves	vandnabe@gmail.com	
Andrea Clemente Simon	requesttrt@gmail.com	jennammub (Amazon)
Anil Anil	anil07john@gmail.com	
Anil Anil	carolyn.b32@yahoo.com	
Anil Anil	christensenb38@yahoo.com	
Anil Anil	dannymartha23@gmail.com	
Anil Anil	debbie.rowden@yahoo.com	
Anil Anil	derin1162@yahoo.com	
Anil Anil	jimmyneon0@gmail.com	
Anil Anil	joseph.bines@yahoo.com	
Anil Anil	jroxyjhon@gmail.com	
Anil Anil	malnaanah316@gmail.com	
Apil Anil	martin.matt10@yahoo.com	
Anil Anil	mikejackson145@yahoo.com	
Anil Anil	nick2566@yahoo.com	
Anil Anil	ninaw15@yahoo.com	
Anil Anil	reedermysti@gmail.com	
Anil Anil	santos.natalie72@yahoo.com	
Anil Anil	sarakannad24@gmail.com	
Anil Kumar (Defendant)	kamaideep.8686@gmail.com	
Anil Kumar (Defendant)	reportupdatebooks@gmail.com	
Anil Kumar (Defendant)	reportupdatesbooks@gmail.com	
Anindita Mahanta	aninditaamahanta@gmail.com	
ANK EXIM LLC (Defendant)	ankushupadhadhya@gmail.com	Ankush Sharma
ANK EXIM LLC (Defendant)	westpvtltd@gmail.com	Ankush Sharma
Ankush Sharma	alex.hales8480@yahoo.com	
Ankush Sharma	ankur101022garg@gmail.com	
Ankush Sharma	bablikumari4261@outlook.com	
Ankush Sharma	babysharma85521@outlook.com	
Ankush Sharma	bhooradone210@gmail.com	
Ankush Sharma	bhooragumthalkadone@gmail.com	
Ankush Sharma	checkorders334@gmail.com	
Ankush Sharma	cmichale8150@yahoo.com	
Ankush Sharma	CristoferThomas74@outlook.com	
Ankush Sharma	davidwarner239@yahoo.com	
Ankush Sharma	diwakarji95@yahoo.com	
Ankush Sharma	dwarner93897@yahoo.com	
Ankush Sharma	freedy.gomes.003@gmail.com	
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Ankush Sharma	jamesbond5241@yahoo.com	
Ankush Sharma	jasonroy3294@yahoo.com	Ramesh Kumar
Ankush Sharma	johncart0102@gmail.com	
Ankush Sharma	jyotisharma28930@gmail.com	
Ankush Sharma	kamalsingh659@outlook.com	
Ankush Sharma	kirankumar748@outlook.com	
Ankush Sharma	komal859@outlook.com	
Ankush Sharma	kunalpandit51541@outlook.com	
Ankush Sharma	kunalprajapati431@outlook.com	
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Ankush Sharma	mindijaxner@gmail.com	
Ankush Sharma	nj5772224@gmail.com	<u>'</u>

### Case 1:23-cv-07284-PAC Document 34 Filed 09/14/23 Page 15 of 27

Defendant, Alias, or Other Name Used	Email Address	Business Name, Additional Name, or Marketplace
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Balbir Singh Bisht	abigailtrevena2@gmail.com amazinghot2021@gmail.com	
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Balbir Singh Bisht	armytagea7@gmail.com	
Balbir Singh Bisht	armytagea/@gmail.com ashleymckoyam@gmail.com	
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### Case 1:23-cv-07284-PAC Document 34 Filed 09/14/23 Page 16 of 27

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Jyoti Patel	heyitsjoy7777@gmail.com arunareddyk1984@gmail.com	aruna r (Amazon)

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Defendant, Alias, or Other Name Used	Email Address	Business Name, Additional Name, or Marketplace
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Kamal Deep	rajneeshvedi@gmail.com	HK VOLUME EXPORT PVT LTD
Kamal Deep	reportupdatesbooks@gmail.com	HK VOLUME EXPORT PVT LTD
Kamal WareHouse	sixhdlive@gmail.com	
Kashif Rashid	iizforwardingllc@gmail.com	
Kashif Rashid	lifeoktatas@gmail.com	textandread 🚣 (Amazon)
Khaled Hasan (Defendant)	arunareddyk1984@gmail.com	aruna r (Amazon)
Khaled Hasan (Defendant)	aurumambllc@gmail.com	ALIDITA (amb (A mazon)
Khaled Hasan (Defendant)	aurumambllc@gmail.com	AURUMamb (Amazon)  NC onlineshop
Khaled Hasan (Defendant)	beautyak995@gmail.com	STEPHANIE NEDELEC (Amazon)
Khaled Hasan (Defendant)	bhaveshdd16@gmail.com	STEPHANIE NEDELEC (Alliazon)
Khaled Hasan (Defendant)	checkorders334@gmail.com	IIZ Forwarding LLC (Defendant)
Khaled Hasan (Defendant)	danikasawyer@yahoo.com	Ouella Danielle Flynn (Amazon)
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Khaled Hasan (Defendant)	iizforwardinglic@gmail.com	IIZ Forwarding DEC (Determin)
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Khaled Hasan (Defendant)		Slava Boutique (Amazon)
Khaled Hasan (Defendant)	joeyousfamrtwo@gmail.com	Slava Bottlique (Altiazon)
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Khaled Hasan (Defendant)	khaledhasan.6497@gmail.com	
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Khaled Hasan (Defendant)	kristelmorn@yahoo.com	HZ Forwarding LLC (Defendant)
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Khaled Hasan (Defendant)	lifeoktatas@gmail.com	AEROLINE FAST (Amazon)
Khaled Hasan (Defendant)	maxonlinemarkets@gmail.com paynegrace19@yahoo.com	IIZ Forwarding LLC (Defendant)
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Khaled Hasan (Defendant)  Khaled Hasan (Defendant)	zippeneuntaginancom	Amber Supplements Co. (Amazon)
Khaled Hasan (Defendant)  Khaled Hasan (Defendant)		awake store (Amazon)
Khaled Hasan (Defendant)		gulzstore (Amazon)
		Jones Anesthesia Services, LLC (Amazon)
Khaled Hasan (Defendant)		Markail Central (Amazon)
Khaled Hasan (Defendant)		McGraw-Hill Education (Amazon)
Khaled Hasan (Defendant)		MEDIASTAR BOOKSTORE (Amazon)
Khaled Hasan (Defendant)		Melissa Ann Helmer (Amazon)
Khaled Hasan (Defendant)		NorthTopS (Amazon)
Khaled Hasan (Defendant)		Panday Book Store (Amazon)
Khaled Hasan (Defendant)		Prosperity Sale (Amazon)
Khaled Hasan (Defendant) Khaled Hasan (Defendant)		Pv Works, Inc. (Amazon)
		Pv-harrison, Llc (Amazon)
Khaled Hasan (Defendant)		READER INBOX (Amazon)
Khaled Hasan (Defendant)		SEPA LAND (Amazon)
		Shikara Store (Amazon)
Khaled Hasan (Defendant)		
Khaled Hasan (Defendant)		Store Shipper LLC (Amazon)
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Khaled Hasan (Defendant) Khaled Hasan (Defendant) Khalid Kouros Shahidi (Defendant)	jimmy6ty@gmail.com	DAMEFILYOSIS (Amazon) Reboyui (Amazon)
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Defendant, Alias, or Other Name Used	Email Address	Business Name, Additional Name, or Marketplace
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Madeleine Williams	magdalen1213@gmail.com	French
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Pardeep Kumar	catherine.w28@yahoo.com	
Pardeep Kumar	ciusm48@gmail.com	
Pardeep Kumar	debrodi0@gmail.com	
Pardeep Kumar	dmisty383@gmail.com	
Pardeep Kumar	jonesbeckh@gmail.com	
Pardeep Kumar	jorgenick@rediffmail.com	
Pardeep Kumar	justin.dust@yahoo.com	
Pardeep Kumar	kevinspaceykk@yahoo.com	
Pardeep Kumar	limaiers2520@rediffmail.com	
Pardeep Kumar	lowet0216@gmail.com	
Pardeep Kumar	marialinda 152@yahoo.com mistnony@yahoo.com	
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	sbgracia42@yahoo.com sw704053@gmail.com thorson835@gmail.com	

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Pooja Bisht	jamesfock58@yahoo.com	
Pooja Bisht	jason.roy91@yahoo.com	
Pooja Bisht	ksatish280@yahoo.com	
Pooja Bisht	paigelabe01@yahoo.com	
Pooja Bisht	ramraheem708@yahoo.com	
Pooja Bisht	ShaliniASharma01@outlook.com	
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Prag Nirwan	coolddbe@gmail.com	
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### Case 1:23-cv-07284-PAC Document 34 Filed 09/14/23 Page 21 of 27

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Financial Institution / Payment	Redacted Account or ACH	Information Source
Processor	Number	
Abebooks	QUEVECK	Test Buy
Abebooks	QUEVECK	Test Buy
Amazon	6102	Amazon
Amazon	2405	Amazon
Amazon	3302	Amazon
Amazon	1915	Amazon
Amazon	8702	Amazon
Amazon	3902	Amazon
Amazon	8802	Amazon
Amazon	7902	Amazon
Amazon	3902	Amazon
Amazon	5902	Amazon
Amazon	7802	Amazon
Amazon	6790	Amazon
Amazon	0302	Amazon
Amazon	A10HCC2UDCMO6L	Amazon
Amazon	A18F8V4ZFSE84S	Amazon
Amazon	A1DGVI5U4309Q4	Amazon
Amazon	A1PTUG172ZQG5X	Amazon
Amazon	A2D87NZZKJNSTY	Amazon
Amazon	A2F9RV9OK8Z0A2	Amazon
Amazon	A2GB60FV2ZUBK0	Amazon
Amazon	A2HKDNAHRV7E88	Amazon
Amazon	A2J7HIN6WTRTW1	Amazon
Amazon	A2N4DTV6H2BSEX	Amazon
Amazon	A2N7Z8HI9MMBOV	Amazon
Amazon	A2OEHJQR3MFT4G	Amazon
Amazon	A2SRPHRJB6X69G	Amazon
Amazon	A2TMGRPOM9H9Q3	Amazon
Amazon	A3CHZPYXB5ZB25	Amazon
Amazon	A3CT6HNIO34WXO	Amazon
Amazon	A578I5QW69H92	Amazon
Amazon	A6CI7KAWGZM0M	Amazon
Amazon	A6DDKMPWLUKJ5	Amazon
Amazon	AOMBBUM01NGSJ	Amazon
Amazon	ASIFPIOMTKFV9	Amazon
Amazon	AXKJGWPTIJATT	Amazon
Axis Bank	8174	PayPal
Axis Bank	9258	PayPal
Bank of America, N.A.	5612	PayPal
Bank of America, N.A.	2820	PayPal
Bank of America, N.A.	4099	eCampus
Bank of America, N.A.	4099	PayPal

Financial Institution / Payment	Redacted Account or ACH	Information Source
Processor	Number	
Bank of America, N.A.	5559	eCampus
Bank of America, N.A.	5559	eCampus
Bank of America, N.A.	5558	eCampus
Bank of America, N.A.	5557	eCampus
Bank of America, N.A.	5557	eCampus
Bank of America, N.A.	4099	Bank of America
Bank of America, N.A.	0000	PayPal
Bank of America, N.A.	5039	Bank of America
Bank of America, N.A.	5194	Bank of America
Bank of America, N.A.	5288	Bank of America
Bank of America, N.A.	5409	Bank of America
Bank of America, N.A.	5612	Bank of America
Bank of America, N.A.	2820	Bank of America
BANK OF THE WEST	5261	PayPal
BMO Bank N.A.	5261	BMO Bank N.A.
Canadian Imperial Bank of commerce	2291	Amazon
Citibank for international wire transfer	9132	eCampus
Citibank for international wire transfer	8200	eCampus
Citibank for international wire transfer	5973	eCampus
Citibank for international wire transfer	8219	eCampus
Citibank, N.A.	6689	Citibank, N.A.
Community Federal Savings Bank	9162	eCampus
Community Federal Savings Bank	2589	eCampus
Community Federal Savings Bank	2590	eCampus
Community Federal Savings Bank	2594	eCampus
Community Federal Savings Bank	9946	eCampus
Community Federal Savings Bank	9946	eCampus
Community Federal Savings Bank	9946	eCampus
Community Federal Savings Bank	9947	eCampus
Community Federal Savings Bank	9947	eCampus
Community Federal Savings Bank	9947	eCampus
Community Federal Savings Bank	9947	eCampus
Community Federal Savings Bank	9949	eCampus
Community Federal Savings Bank	9950	eCampus
Community Federal Savings Bank	9950	eCampus
Community Federal Savings Bank	9950	eCampus
eBay	geniuswindow?	Test Buy
eBay	ncbooks	Test Buy
eBay	padid798	Test Buy
Federal Bank	7878	PayPal
First Century Bank, N.A.	2361	eCampus
First Century Bank, N.A.	2526	eCampus
First Century Bank, N.A.	8189	eCampus

Financial Institution / Payment	Redacted Account or ACH	Information Source
Processor	Number	
First Century Bank, N.A.	8189	eCampus
First Century Bank, N.A.	2638	eCampus
First Century Bank, N.A.	2387	eCampus
First Century Bank, N.A.	6129	eCampus
First Century Bank, N.A.	2716	eCampus
First Century Bank, N.A.	2991	eCampus
First Century Bank, N.A.	1265	eCampus
First Century Bank, N.A.	1265	eCampus
First Century Bank, N.A.	2385	eCampus
First Century Bank, N.A.	8191	eCampus
First Century Bank, N.A.	8191	eCampus
First Century Bank, N.A.	8191	eCampus
First Century Bank, N.A.	2990	eCampus
First Century Bank, N.A.	2990	eCampus
First Century Bank, N.A.	2384	eCampus
First Century Bank, N.A.	2384	eCampus
First Century Bank, N.A.	8190	eCampus
First Century Bank, N.A.	8190	eCampus
First Century Bank, N.A.	8190	eCampus
First Century Bank, N.A.	8190	eCampus
First Century Bank, N.A.	8190	eCampus
First Century Bank, N.A.	4076	Amazon
First Century Bank, N.A.	9719	eCampus
First Century Bank, N.A.	9719	eCampus
First Century Bank, N.A.	9875	Amazon
First Century Bank, N.A.	2383	eCampus
First Century Bank, N.A.	2383	eCampus
First Century Bank, N.A.	2383	eCampus
HDFC BANK	3596	PayPal
HDFC BANK	7965	PayPal
HDFC BANK	1831	PayPal
HDFC BANK	6453	PayPal
HDFC BANK	2091	PayPal
HDFC BANK	9384	PayPal
HDFC BANK	3296	PayPal
HDFC BANK	8554	PayPal
HDFC BANK	0816	PayPal
HDFC BANK	0129	PayPal
HDFC BANK	0409	PayPal
HDFC BANK	3583	PayPal
HDFC BANK	3596	PayPal
HDFC BANK	8335	PayPal
HDFC BANK	8020	PayPal

Financial Institution / Payment	Redacted Account or ACH	Information Source
Processor	Number	
HDFC BANK	2318	PayPal
HDFC BANK	7907	PayPal
HDFC BANK	4035	PayPal
HDFC BANK	0418	PayPal
HDFC BANK	1830	PayPal
ICICI BANK LIMITED	4005	PayPal
ICICI BANK LIMITED	5652	PayPal
ICICI BANK LIMITED	9276	PayPal
ICICI BANK LIMITED	9447	PayPal
ICICI BANK LIMITED	1123	PayPal
ICICI BANK LIMITED	1630	PayPal
ICICI BANK LIMITED	0636	PayPal
INDUSIND BANK	7777	PayPal
JPMorgan Chase Bank, N.A.	2968	PayPal
JPMorgan Chase Bank, N.A.	166	PayPal
JPMorgan Chase Bank, N.A.	6849	JPMorgan Chase
JPMorgan Chase Bank, N.A.	1993	PayPal
JPMorgan Chase Bank, N.A.	9289	JPMorgan Chase Bank, N.A.
JPMorgan Chase Bank, N.A.	9289	JPMorgan Chase Bank, N.A.
PayPal	1305	PayPal
PayPal	6560	PayPal
PayPal	8806	PayPal
PayPal	8806	PayPal
PayPal	8748	PayPal
PayPal	2973	PayPal
PayPal	2973	PayPal
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PayPal	5172	PayPal
PayPal	0698	PayPal
PayPal	9136	PayPal
PayPal	5529	PayPal
PayPal	2460	PayPal
PayPal	0733	PayPal
PayPal	2520	PayPal
PayPal	4771	PayPal
PayPal	9064	PayPal
PayPal	5229	PayPal
PayPal	4555	PayPal
PayPal	4390	PayPal
PayPal	2837	PayPal
PayPal	3460	PayPal

# Case 1:23-cv-07284-PAC Document 34 Filed 09/14/23 Page 27 of 27

Financial Institution / Payment	Redacted Account or ACH	Information Source
Processor	Number	
PayPal	3106	PayPal
PayPal	1564	PayPal
PayPal	4570	PayPal
PayPal	3582	PayPal
PayPal	5400	PayPal
PayPal	6359	PayPal
PayPal	4609	PayPal
PayPal	0522	PayPal
PayPal	8245	PayPal
PayPal	9144	PayPal
PayPal	9144	PayPal
PayPal	2715	PayPal
PayPal	4771	PayPal
PNC Bank, NA	6433	PNC Bank
RBL Bank Limited	2600	PayPal
Royal Bank of Canada	1821	Amazon
Voyage Federal Credit Union	4074	Voyage Federal Credit Union
Voyage Federal Credit Union	8596	Voyage Federal Credit Union
Voyage Federal Credit Union	1766	Voyage Federal Credit Union
Voyage Federal Credit Union	3141	Voyage Federal Credit Union
Wells Fargo Bank NA	4495	Wells Fargo
Wells Fargo Bank NA	4495	Wells Fargo
Wells Fargo Bank NA	3197	PayPal
Wells Fargo Bank NA	7891	PayPal
Wells Fargo Bank NA	9725	Wells Fargo
YES BANK	0388	PayPal